

# EXHIBIT B

**LAW OFFICE of NICOLE G. GAINAY**

7633 S. 126<sup>th</sup> Street # 78051 Seattle, WA 98136

September 03, 2015

ZNet Technologies Pvt. Ltd.  
9330 LBJ Freeway, Suite 900  
Dallas TX, 75243

**Re: Notice to Cease and Desist Internet Defamation, Defamation *per se*, and Libel**

Dear Sir or Madam:

Please be advised that this office represents American Marriage Ministries (AMM). Kindly direct all future communications concerning this matter to my attention. Further, if you are represented by counsel, please direct this correspondence to them for their review and consideration.

Please also be advised that my office has been retained by AMM to investigate and take legal action against you for the unwarranted attacks made by you. Specifically, you host a website, [www.americanmarriageministries.com](http://www.americanmarriageministries.com), on which you have published information that constitutes defamation, defamation *per se*, and libel under Washington law. Among the offending statements and information contained on the web site are its title, "American Marriage Ministries – Not Legally Valid." The web page's meta description code:

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<meta name="description" content="This webpage exists to inform would-be ministers that ordinations performed by the American Marriage Ministries located at theamm.org are not legally valid."/>
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yields the following meta description of the web page (this is what appears below the link in Google search results):

This webpage exists to inform would-be ministers that ordinations performed by the American Marriage Ministries located at theamm.org are not legally valid.

The website also displays the following statement:

This webpage exists to inform would-be ministers that ordinations performed by the American Marriage Ministries, located online at <http://www.theamm.org> are NOT considered legally valid...for purposes of performing marriages...

The above statements and information published in reference to AMM are utterly false and without merit. **Moreover, they constitute defamation *per se* in that they depict my client as engaging in fraudulent activity that violates civil and criminal law.**

By hosting this website, you have committed defamation, defamation *per se*, and libel and your actions have caused my client serious and irreparable injury to its reputation, its mission, and its ministry.

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We hereby demand that you:

1. Immediately cease and desist in hosting websites that include defamatory or disparaging information concerning my client, whether the statements were made by you or third parties, and
2. Compensate my client for its attorney's fees and costs.

Please note that this law office does not attempt to restrict legitimate free speech that is protected by the First Amendment of the U.S. Constitution. Your activities, however, encroach on my client's rights.

This letter puts you on notice that, should you refuse to comply with our demands **within fourteen days** of this writing (September 18, 2015), I will be left with no choice but to recommend that my client pursue all legal causes of action, including the filing of a lawsuit to protect its interests..

This matter requires your immediate attention, and I therefore strongly recommend that you contact me immediately to address and resolve this situation. This letter constitutes your one and only chance to resolve this matter amicably.

Sincerely,



Nicole Gainey  
Attorney at Law